

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

REX VENTURE GROUP, LLC
d/b/a ZEEKREWARDS.COM, and
PAUL BURKS,

Defendants.

Civil Action No. 3:12 cv 519

**RECEIVER'S MOTION TO SEAL RECEIVER'S SUPPLEMENTAL RESPONSE IN
OPPOSITION TO VICTORIABANK'S MOTION TO DISMISS**

Kenneth D. Bell, the Court-appointed Receiver ("Receiver") for Rex Venture Group, LLC d/b/a ZeekRewards.com ("RVG" or "Receivership Defendant"), respectfully moves this Court pursuant to Local Rule of Civil Procedure 6.1 and the Protective Order in this above-captioned case to seal the Receiver's accompanying Supplemental Response in Opposition to Victoriabank's Motion to Dismiss and the accompanying exhibits.

In support of this Motion to Seal and in accordance with Local Rule 6.1, the Receiver submits the following:

Attached to the underlying Receiver's Supplemental Response in Opposition to Victoriabank's Motion to Dismiss are documents that third parties have produced and designated "Confidential" pursuant to the Court's January 22, 2013 Protective Order, as amended on

November 22, 2013¹ (“Protective Order”) (Dkt. Nos. 119, 167). The Court’s Protective Order requires parties to file under seal motions or other papers that contain non-redacted Confidential Information. (Protective Order ¶ 7.) Accordingly, pursuant to Local Rule 6.1 and the Court’s Protective Order, the Receiver respectfully requests that this Court seal the underlying Receiver’s Supplemental Response in Opposition to Victoriabank’s Motion to Dismiss.

CONCLUSION

For the reasons stated above, the Receiver respectfully requests that this Court grant the Receiver’s Motion to Seal and seal the Receiver’s underlying Supplemental Response in Opposition to Victoriabank’s Motion to Dismiss.

Respectfully submitted this 24th day of March, 2017.

By: /s/ Kenneth D. Bell
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¹ The Receiver does not concede that any of the “Confidential” designations on the underlying materials is proper. The Receiver submits this Motion to Seal out of an abundance of caution and does not waive and reserves its right to dispute the propriety of any designation made under the Protective Order.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have electronically filed the foregoing using the CM/ECF system which will send notification to counsel of record registered to receive electronic service.

This the 24th day of March, 2017.

/s/ Irving M. Brenner